

DANIEL G. BOGDEN
United States Attorney
District of Nevada

CAROLYN B. CHEN, C.S.B.N. 256628
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, CA 94105
Telephone: (415) 977-8956
Facsimile: (415) 744-0134
Carolyn.Chen@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CAROL CARTER,)	
)	Case No. 2:14-cv-01825-MMD-GWF
Plaintiff,)	
)	
v.)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME FOR
CAROLYN W. COLVIN,)	DEFENDANT TO FILE CROSS-MOTION
Acting Commissioner of Social Security,)	TO AFFIRM/RESPONSE TO
)	PLAINTIFF'S MOTION FOR
Defendant.)	REMAND/REVERSAL
)	

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm/Response to Plaintiff's Motion for Remand/Reversal (hereinafter "Defendant's response"), due on February 22, 2016, by 60 days, through and including April 22, 2016. This is the first extension sought in this case, and the first extension sought by Defendant.

There is good cause for this request. An extension of time is needed because Defendant's counsel will need more time to review and prepare Defendant's response, due to her heavy workload in

1 the last month and continuing heavy workload in the next two months that cannot be covered by another
2 attorney, including a full district court caseload, a Ninth Circuit appellate brief that has also been
3 extended, mentoring a colleague on their first court oral argument in February, and preparing briefs and
4 conducting discovery, including multiple depositions, for two Equal Employment Opportunity
5 Commission (EEOC) cases in January and February, and again occurring in March and April for the
6 second and a third EEOC case. This request is made in good faith with no intention to unduly delay the
7 proceedings.

8 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion.

9 Respectfully submitted this 17th day of February.

10 DANIEL G. BOGDEN
11 United States Attorney

12 /s/ Carolyn B. Chen
13 CAROLYN B. CHEN
14 Special Assistant United States Attorney

15
16 IT IS SO ORDERED:

17 
18 UNITED STATES MAGISTRATE JUDGE

19
20 DATED: February 18, 2016

CERTIFICATE OF SERVICE

I, **Carolyn B. Chen**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO FILE CROSS-MOTION TO AFFIRM/RESPONSE TO PLAINTIFF'S MOTION FOR REMAND/REVERSAL** on the date and via the method of service identified below:

CM/ECF:

**Nicole K. Steinhaus, Esq.
Shook & Stone, Chtd.
710 South Fourth Street
Las Vegas, Nevada 89101
nsteinhaus@shookandstone.com**

Dated this 17th day of February 2016.

/s/ Carolyn B. Chen
CAROLYN B. CHEN
Special Assistant United States Attorney